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February 4, 2005

TO: Mr. Russell Hart, RPM  
United States Environmental Protection Agency  
Region V  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

FROM: Mr. David Curnock, PM, SECOR International Incorporated 

RE: **MONTHLY PROGRESS REPORT/MEMORANDUM**  
**Area 9/10 Remedial Design**  
**Southeast Rockford Groundwater Contamination Superfund Site**  
**Rockford, Illinois**

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Copies: Mr. Thomas Turner, Regional Counsel, USEPA Region V  
Mr. Scott Moyer, Hamilton Sundstrand/United Technologies Corporation  
Ms. Kathleen McFadden, United Technologies Corporation  
Mr. Thomas Williams, PM, IEPA  
Mr. Terry Ayers, IEPA

**CURRENT MONTH PROJECT ISSUES/STATUS:** *(activities, meetings, deliverables, etc.)*

Activities conducted in January 2005 consisted of the continuation of Pre-Design Investigation activities along with some additional efforts regarding the upgrading of the jet fuel recovery systems in the east end of the South Alley at the Hamilton Sundstrand plant.

The laboratory results from the four soil borings that were completed as shallow monitoring wells (SMW-19, SMW-20, SMW-21, and SMW-22) and the recent round of groundwater laboratory analytical results from all wells have been compiled with other existing analytical data for validation and evaluation. Raw analytical data for these soil and groundwater samples collected in November 2004 have been incorporated into the table previously provided during the status update meeting (August 10, 2004). This table now includes all soil and groundwater analytical results from the Area 9/10 Pre-Design Investigation activities along with historic groundwater results from Remedial Investigation wells MW-201, MW-202, and MW-203. This table, along with a figure exhibiting groundwater sampling results, will be provided in draft form with the next Monthly Progress Memorandum.

Based on these groundwater sampling results and the potential for an up-gradient (residual) source to be located under the plant, alternative contaminant source identification and access means have been explored. Because plant building access is prohibitive due to on-going operations, horizontal drilling and angle drilling techniques and capabilities have been identified as potential means of further source assessment as well as the potential for inclusion in future design parameters. Information regarding off sets, angles, and site preparation requirements is being gathered for horizontal and angle drilling to assist in determination of potential off-site access concerns for deployment of these techniques.

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The replacement of RW-3 was completed in December 2004. New air driven skimmer pump systems were installed in RW-3R and RW-1, replacing the former skimming pump systems. Gauging of the wells in December and January did not indicate the presence of a measurable thickness of product. Since operation of the new pumps began, less than one gallon of LNAPL has been collected in total. The new systems will continue to be monitored and evaluated. On-going recovery progress information will be provided in these monthly progress memoranda.

Preliminary discussions with USEPA, IEPA, and SECOR personnel were undertaken on January 27, 2005 at the USEPA's office in Chicago with regard to removal of near surface soils in the former Outside Container Storage Area (OSA) located near the northwest portion of the Hamilton Sundstrand facility. These discussions consisted of alternative concepts for administration of the work in terms of potential deliverables (Scope of Work) that would be necessary to affect such work. It was noted in the discussions that this activity was not intended to replace, modify, or affect the Record of Decision (ROD), but rather was a legitimate derivative of the results of information gathered during the Preliminary Design Investigation. Further discussion regarding the manner by which this activity can take place will be undertaken with the USEPA and Hamilton Sundstrand. The highest concentrations of volatile organic compounds and metals have been historically measured in the near surface soils. By removal of these higher concentration materials, residual source reduction is achieved. Backfilling the excavated area with a less permeable soil (silty/clayey matrix versus sand) will provide additional residual migration potential reduction. It is anticipated that this type of action will be undertaken during the spring or summer of 2005 if approved by the USEPA.

### **FUTURE PROJECT ISSUES/STATUS:** *(activities, meetings, deliverables, etc.)*

Future project activities for January 2005 will include continuation of monitoring and evaluation of LNAPL (JP-4) presence and recovery at the eastern end of the South Alley. The laboratory results from the four soil borings that were completed as shallow monitoring wells (SMW-19, SMW-20, SMW-21, and SMW-22) and the recent round of groundwater laboratory analytical results from all wells, along with other existing analytical data, will continue to be evaluated in terms of potential residual source identification. The groundwater and soil data will be submitted to the USEPA (et.al.) in table form. Groundwater results will also be presented in figure form. Alternative contaminant source identification and access means will continue to be evaluated. Horizontal and angle drilling may provide potential technologies that can be implemented to allow information gathering and further design parameter development.

The issue of direct removal (excavation) of near surface soils in the former RCRA outdoor container storage area (OSA), as a potential interim action, will continue. Administrative issues with regard to manner by which approval or acknowledgement of the action by USEPA is to be determined. Other technical issues such as excavation logistics (depth, slope stability, shoring versus trench box, small scale pit and fill, subsurface utility protection) are being addressed for development of the scope of work statement.

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### **SAMPLE/TEST DATA SUBMITTALS:**

No additional submittals are included with this memorandum.

### **RD SCHEDULE UPDATE:** *(attach updated schedule as necessary)*

As the activities associated with the Pre-Design Investigation portion of the Remedial Design (RD) continue, the overall schedule continues to be revised. Based on the concentrations of volatile organic compounds in groundwater combined with groundwater flow direction, alternative means to access the area beneath the plant are being evaluated (e.g., horizontal drilling). These alternatives may be incorporated into delineation and possibly design criteria based on further evaluation.

Discussions with the USEPA and the IEPA concerning the direct removal (by excavation) of near surface impacted soils in the OSA will ensue such that this activity could take place in the spring/summer of 2005.

Hamilton Sundstrand will continue to work with the USEPA on keeping the RD efforts for Area 9/10 moving forward in a timely and reasonable fashion.

### **REALIZED/ANTICIPATED PROBLEM CONDITIONS:**

None.

### **PERSONNEL CHANGES:**

None.